

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

THE UNITED STATES OF AMERICA, *ex rel.*  
JULIE LONG,

*Plaintiffs,*

v.

JANSSEN BIOTECH, INC.,

*Defendant.*

Civil Action No. 16-CV-12182-FDS

**JOINT MOTION FOR EXTENSION/MODIFICATION OF PHASE ONE EXPERT  
DEADLINES**

Pursuant to Rule 16 of the Federal Rules of Civil Procedure and Local Rule 16.1, and for the reasons set forth in the accompanying Memorandum of Law in support of this Motion, Plaintiff-Relator Julie Long and Defendant Janssen Biotech, Inc., jointly request that the Court extend and modify the deadlines for Phase One expert disclosures and discovery as follows:

- If Relator intends to call any trial experts whose testimony does not depend on the resolution of the causation standard issue, Relator shall designate such experts and make the disclosures required by Fed. R. Civ. P. 26(a)(2) **within 30 days of the conclusion of the Rule 30(b)(6) deposition of Janssen's corporate representatives.**
- If Defendant intends to call any trial experts in response to such experts, defendant shall designate such experts and make the disclosures required by Fed. R. Civ. P. 26(a)(2) **within 60 days of receipt of Relator's disclosures.**
- If Relator intends to call any trial experts in rebuttal to Defendant's experts' opinions, Relator shall designate such experts and make the disclosures required by Fed. R. Civ. P. 26(a)(2) **within 45 days of receipt of Defendant's disclosures.**
- Any such experts disclosed by Relator and Defendant shall be deposed **within 60 days of receipt of the last occurring event above.**
- Neither party will use the extension sought herein as a basis to seek to reopen Phase One fact discovery.

- Defendant shall make its corporate representative(s) available to be deposed within **30 days** of the Court's ruling on the pending Motion for a Protective Order Concerning Relator's 30(b)(6) Deposition Notice (ECF No. 450).

Dated: January 16, 2025

/s/ Jason C. Raofield

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**CERTIFICATE OF SERVICE FOR JOINT MOTION FOR  
EXTENSION/MODIFICATION OF PHASE ONE EXPERT DEADLINES**

I hereby certify on this 16th day of January, 2025, that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

*/s/ Poorad Razavi*

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Poorad Razavi (Pro Hac Vice)